

Thompson & Knight LLP
Jennifer A. Christian
Ira L. Herman
900 Third Avenue, 20th Floor
New York, NY 10022-4728
Telephone: (212) 751-3001
Facsimile: (212) 751-3113

Hearing Date: December 10, 2014, 10:00 a.m. (ET)
Obj. Deadline: December 3, 2014, 4:00 p.m. (ET)

Attorneys for R. Kyle Kettler

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In Re	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS INC., et al.,	:	Case No.: 08-13555 (SCC)
	:	
Debtors.	:	(Jointly Administered)
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**NOTICE OF MOTION OF R. KYLE KETTLER FOR CLARIFICATION, OR IN THE
ALTERNATIVE, PARTIAL RECONSIDERATION, AND CORRECTION OF ORDER
SUSTAINING OMNIBUS OBJECTIONS AND RECLASSIFYING CLAIMS FOR
RESTRICTED STOCK UNITS AND CONTINGENT STOCK AWARDS**

PLEASE TAKE NOTICE that on November 21, 2014, R. Kyle Kettler (“Kettler”), by and through his undersigned counsel, filed the *Motion of R. Kyle Kettler for Clarification, or In the Alternative, Partial Reconsideration, And Correction of Order Sustaining Omnibus Objections and Reclassifying Claims For Restricted Stock Units and Contingent Stock Awards* (the “Motion”).

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held, if necessary, before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, at the United States Bankruptcy Court, Alexander Hamilton Customs House, Courtroom 623, One Bowling Green, New York, New York 10004 (the “Bankruptcy Court”), on **December 10, 2014 at 10:00 a.m. (Prevailing Eastern Time)** or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must: (i) be in writing; (ii) state the name and address of the responding party and nature of the claim or interest of such party; (iii) state with particularity the legal and factual bases of such objection; (iv) conform to the Federal Rules of Bankruptcy Procedure and Local Bankruptcy Rules; (v) be filed with the Bankruptcy Court, together with proof of service, electronically, in accordance with General Order M-399 by registered users of the Court's Electronic Case Filing system, and by all other parties in interest, on a 3.5 inch disk, compact disk, or flash drive, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format no later than **December 3, 2014 at 4:00 p.m. (Prevailing Eastern Time)** (the "Objection Deadline"); and (vi) be served on (a) Thompson & Knight, LLP, 900 Third Avenue, 20th Floor, New York, New York 10022, Attn: Jennifer A. Christian, Esq. and Ira L. Herman, Esq., and (b) the parties listed on the Master Service List, with a courtesy copy to the chambers of the Honorable Shelley C. Chapman, One Bowling Green, New York, New York, 10004.

PLEASE TAKE FURTHER NOTICE that if no responses are timely filed and served with respect to the Motion, Kettler may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Motion, which may be entered with no further notice or opportunity to be heard offered to any party.

Dated: New York, New York
November 21, 2014

THOMPSON & KNIGHT LLP

By: /s/ Jennifer A. Christian

Jennifer A. Christian
Ira L. Herman
THOMPSON & KNIGHT LLP
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New York, NY 10022-4728
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Attorneys for R. Kyle Kettler